

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND**

IN RE: Gerald R. Galleshaw :  
Debtor :  
 :  
DAVID C. FRAIOLI and NEW :  
ENGLAND AUTO CENTER, INC. :  
Plaintiffs : CASE NO: 15-11047  
 :  
V. :  
 : CHAPTER 7  
 :  
GERALD R. GALLESHAW, : ADV. PRO. NO.: 15-01023  
Defendant :

**MOTION TO EXTEND TIME TO FILE MEMORANDUM OF LAW**

Now comes Plaintiffs, David C. Fraioli and New England Auto Center, Inc. (collectively "Plaintiff"), by its counsel, hereby moves this honorable Court to allow a brief extension of time to file a memorandum of law in support of Plaintiffs' Objection to Defendant, Gerald R. Galleshaw's Application for Entry of Default and Motion for Default Judgment in accordance to the Order that was entered by this Court on May 11, 2016. Plaintiff respectfully requests an extension of time up to and including May 26, 2016.

Wherefore, Plaintiff respectfully request that a brief extension of time up to May 26, 2016, or a time that is convenient with this Court, be granted to allow Plaintiff to file a memorandum of law in support of its Objection.

*Diane Finkle*

05/19/2016 MOTION GRANTED

David C. Fraioli and  
New England Auto Center, Inc.

By its Attorneys,

/s/ Ryanna T. Capalbo, Esq  
Andrew R. Bilodeau, Esq. #7174  
Ryanna T. Capalbo, Esq. #8314  
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Dated: May 19, 2016

CERTIFICATION

I hereby certify that on the 19<sup>th</sup> day of May, 2016, I electronically filed a true and accurate copy of the within document to be sent via electronic means with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System and via email to the following:

Todd Dion, Esq.  
Law Office of Todd S. Dion  
1599 Smith Street  
North Providence, RI 02911

/s/ Ryanna T. Capalbo, Esq.  
Ryanna T. Capalbo, Esq., #8314